



ALASKA PENINSULA CORPORATION
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October 5, 2010

Dennis J. McLerran, Regional Administrator
Environmental Protection Agency, Region 10
1200 Sixth Avenue, Suite 900
Seattle, WA 98101
Phone: (206)553-1200 (800) 424-4372
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Re: Clean Water Act 404(c) process to prohibit certain lands from use as a disposal site
for dredged or fill material

Dear Mr. McLerran:

The Alaska Peninsula Corporation (APC) represents five villages in the Bristol Bay region, two of which are in close proximity to the proposed Pebble project. (Newhalen and Kokhanok). We believe that it is too early to draw conclusions about the Pebble project. To use antiquated mining practices that were the rule of thumb prior to the passage of the National Environmental Policy Act (NEPA) to judge mines today is nothing more than scare tactics to drive away sustainable resource development projects that are much needed for the security of our Nation as well as providing much needed jobs in poverty stricken areas in Bristol Bay.

The BBNC letter singles out Pebble when they ask to “carefully tailor a prohibition of the discharge of dredged or fill material” from the Pebble site. Their request is fraught with a bias against Pebble. There are other potential projects in Bristol Bay, some owned by the BBNC. BBNC has a conflict of interest because of that position. They cite the notion that the commercial fishery is the lifeblood of the economy of Bristol

Bay. In reality, the economy in rural villages is virtually non-existent as attested by a recent demographic study by the Alaska Federation of Natives.

We are writing you because we believe that letters to the EPA from Bristol Bay organizations like the Bristol Bay Native Corporation urging the EPA to invoke under its authority from Section 404(c) of the Clean Water Act circumvent the public process. When representatives from APC met with EPA representatives in Washington DC in 2006, they expressed concern about the growing Environmental Non-governmental Organizations (ENGO's) have in the permitting process at Pebble. We were assured that it was "Not the loudest voice but the best science" that would determine the future of projects like Pebble.

APC understands that EPA went to Dillingham to hear local concerns about Pebble. The timing of the visit coupled with the fear of public persecution by the anti mine zealots was the overriding factor in our decision not to attend the Dillingham meeting. We feel that it is imperative that you hear our views and we are proposing that we go to either Seattle or Washington in November to express to you our position so that there is no misunderstanding about our views on sustainable resource development. We are puzzled by the BBNC letter noting that they supported sustainable economic development since their inception. To condemn a project even before it files its feasibility study and application for permits is irresponsible.

Sincerely,

ALASKA PENINSULA CORPORATION

Ralph Angasan, President

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¹ Signature on file at the APC Office